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*Attorneys for Plaintiffs Modern Eminence LLC,
Modern Fortress, Inc. and AllRealms Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MODERN EMINENCE, LLC, MODERN
FORTRESS, INC., AND ALLREALMS,
INC.

Plaintiffs,

vs.

NATHAN PARK

Defendant.

Case No.: 2:24-cv-00348-CDS-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR PLAINTIFFS
TO RESPOND TO DEFENDANT'S
MOTION TO DISMISS AMENDED
COMPLAINT AND DEFENDANT'S
MOTION TO STAY CASE (FIRST
REQUEST)**

1 Plaintiffs Modern Eminence LLC, Modern Fortress, Inc., and AllRealms, Inc.
 2 (“Plaintiffs”), by and through their counsel of record, John P. Desmond, Esq. with the law firm
 3 of Dickinson Wright PLLC, and Defendant Nathan Park (“Park”) by and through his counsel of
 4 record, Jarrod L. Rickard, Esq. and Katie L. Cannata, Esq. with the law firm of Semenza Rickard
 5 Law, (together, the “Parties”) hereby stipulate and agree, subject to this Court’s approval, as
 6 follows:

7 WHEREAS, Park filed his Motion to Dismiss Amended Complaint [ECF 16] and his
 8 Motion to Stay Case [ECF 17] on May 20, 2024;

9 WHEREAS, on May 20, 2024, the Court ordered Plaintiffs to respond to those motions
 10 by June 3, 2024;

11 WHEREAS, Park has agreed to provide Plaintiffs up to and including June 6, 2024 to
 12 respond to his Motion to Dismiss Amended Complaint and his Motion to Stay Case; and

13 WHEREAS, this is the first request filed with this Court to extend the time for the
 14 Plaintiffs to respond to Park’s Motion to Dismiss Amended Complaint and his Motion to Stay
 15 Case and Plaintiffs have requested the extension in good faith and not to delay this matter.

16 ACCORDINGLY, the Parties hereby request that the Court grant this Stipulation to
 17 extend the deadline for Plaintiffs to file responses to Park’s Motion to Dismiss Amended
 18 Complaint and Motion to Stay Case to June 6, 2024.

19 This Stipulation is made in good faith and is not made for the purpose of delay. The
 20 Parties agree that good cause exists for this continuance.

21
 22 DATED this 30th day of May, 2024

DATED this 30th day of May, 2024

23 DICKINSON WRIGHT PLLC

SEMENZA RICKARD LAW

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26 *Attorney for Plaintiffs*

Attorneys for Defendant Nathan Park

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: May 30, 2024